

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

**AMENDED OBJECTIONS OF CREDITORS DEBORAH RYAN, WALTER  
SWIFT, CRISTOBAL MENDOZA AND ANNICA CUPPETELLI,  
INTERESTED PARTIES, TO AMENDED PLAN FOR THE ADJUSTMENT  
OF DEBTS OF THE CITY OF DETROIT AND CERTIFICATE OF  
SERVICE**

NOW COME DEBORAH RYAN, WALTER SWIFT, CRISTOBAL  
MENDOZA and ANNICA CUPPETELLI, interested parties and object to the  
“*Second Amended Plan for the Adjustment of Debts of the City of Detroit (April 16,  
2014).*” [Dkt. #4140] In support of those objections, the aforementioned interested  
parties state the following:

1. On April 15, 2014, these Petitioners filed their Objections, [Dkt.  
#4099], to the earlier “Amended Plan” filed by the Debtor on March 31, 2014).  
[Dkt. #3380];
2. Thereafter on April 16, 2014, the Debtor filed yet another Amended  
Plan [Dkt. #4140], which continues to persist in this Debtor’s determination to ask



this Court to provide relief that will violate the Fourteenth Amendment of the United States Constitution;

3. The newly filed and equally objectionable Amended Plan substitutes the newly objectionable Paragraph 189 for the previously objectionable Paragraph 19. Both paragraphs contain precisely the same objectionable language;

4. Therefore, these Petitioners seek to make clear that the same Objections, previously filed as Docket #4099, apply with equal force to the Debtor's latest offering, its Second Amended Plan of Adjustment, Docket. #4140, in particular, Paragraph 189 thereof.

**WHEREFORE**, these Petitioners request the same relief sought in their earlier Objections [Dkt. #4099-1] and Brief In Support thereof [Dkt. #4099-2], for precisely the same the reasons and authority cited therein, but as to the Second Amended Plan of Adjustment, Docket. #4140, in particular, Paragraph 189 thereof.

Respectfully submitted,

**GOODMAN & HURWITZ, P.C.**

By:/s/William H. Goodman  
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Cristobal Mendoza and Annica Cuppetelli*

Dated: April 22, 2014

## CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2014, I electronically filed *Amended Objections of Creditors Deborah Ryan, Walter Swift, Cristobal Mendoza and Annica Cuppetelli, Interested Parties, to Amended Plan for the Adjustment of Debts of the City of Detroit* and this *Certificate Of Service* attached, with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

GOODMAN & HURWITZ, P.C.

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